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**From:** Fennessy, Christopher [christopher.fennessy@Rocket.com]  
**Sent:** 4/16/2018 10:26:00 PM  
**To:** Keller, Lynn [Keller.Lynn@epa.gov]  
**CC:** MacDonald, Alex@Waterboards (Alex.MacDonald@waterboards.ca.gov) [Alex.MacDonald@waterboards.ca.gov]; MacNicholl, Peter@DTSC [Peter.MacNicholl@dtsc.ca.gov]; Bradfish, Larry [Bradfish.Larry@epa.gov]; Alasti, Isabella@DTSC [Isabella.Alasti@dtsc.ca.gov]; Lancaster, David@Waterboards [David.Lancaster@Waterboards.ca.gov]; Hvidsten, William [william.hvidsten@Rocket.com]  
**Subject:** RE: [EXTERNAL] Request for revised Aerojet Area 40 FS ARARs tables  
**Attachments:** Area 40 ARARs 4-16-18.xlsx

Hi Everyone – I have updated the ARARs table as requested. I think I captured all of Larry Bradfish's comments. I have combined all three tables into one table in Excel, created separate columns for media, created two columns for State Requirements and Federal Requirements, ordered Federal ARARs on top and State ARARs on the bottom, and made some other minor adjustments as requested. I was not sure which State ARARs are action, location, or chemical specific. I took a shot. I also did not see a statement/caveat at the end of the OU-6 FS ARARs tables regarding the State having additional requirements. Lynn – can you send me a .pdf of that language or point me to the specific page in the OU-6 FS?

Please review and comment. Thanks! Chris

**Christopher M. Fennessy, P.E.**  
**Aerojet Rocketdyne, Inc.**  
Engineering Manager, Site Remediation  
11260 Pyrites Way, Suite 125  
Rancho Cordova, CA 95670  
Ph: 916-355-3341  
Fax: 916-355-6145  
Email: [Christopher.Fennessy@Rocket.com](mailto:Christopher.Fennessy@Rocket.com)

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**From:** Keller, Lynn [mailto:Keller.Lynn@epa.gov]  
**Sent:** Friday, April 13, 2018 6:24 PM  
**To:** Fennessy, Christopher  
**Cc:** MacDonald, Alex@Waterboards (Alex.MacDonald@waterboards.ca.gov); MacNicholl, Peter@DTSC; Bradfish, Larry; Alasti, Isabella@DTSC; Lancaster, David@Waterboards  
**Subject:** [EXTERNAL] Request for revised Aerojet Area 40 FS ARARs tables

Hi, Chris. The agencies got together today to discuss the Area 40 ARARs for the FS. EPA's goal is for a CERCLA-compliant cleanup at Area 40, with one set of ARARs going forward from the FS to the RAP and ROD.

As you and I discussed earlier today, could you please put together a revised ARAR table for the FS incorporating the following items the agencies agreed upon today:

- 1) Please make one master ARAR table by incorporating Appendices B1 and B2 into Appendix B3.
- 2) The master ARAR table should be divided between chemical specific, action specific, and location specific ARAR categories.
- 3) Please list all State-only ARARs last within each category.
- 4) Please add check boxes to each ARAR row (or whatever makes sense) for matrix (soil, groundwater, etc.) so that the ARARs don't need to be repeated on the master list.
- 5) Please include a similar caveat at the end of the ARAR table as was used in the OU6 FS ARAR table...something to the effect of, the State may have additional requirements that need to be met...

- 6) Please remove the Federal soil ARAR for TSCA and PCBs in this Area 40 ARARs table (App B3, p. 1 of 8).
- 7) Appendix B3, p. 6 of 8: 40 CFR Part 261 requirement: Please reword the text in "Action to be Taken to Attain Requirements" column and remove reference to operation of a groundwater treatment plant.
- 8) Appendix B3, p. 6 of 8: 40 CFR Section 262.11 requirement: Please remove reference to operation of a groundwater treatment plant.
- 9) Please incorporate Larry Bradfish's marked up edits to the ARARs table (attached). The handwritten note to the left of each row denotes where the ARAR is repeated in the State or EPA ARARs tables.

Pete and Isabella, if DTSC has additional ARARs that we need to get in this master list that haven't been discussed yet among agencies, please send them out to the group so we can discuss and Aerojet can incorporate into the FS as needed.

Alex and David, please check out some of the ARARs Larry Bradfish noted as "not necessary" or crossed out on the marked up ARARs tables (attached) and let us know if we can delete any of these or if you feel they must be included.

The plan is then for us all to take a look at Aerojet's second ARARs table draft with the updates noted above, any additions from DTSC, or deletions, and then discuss as a group again if necessary to get it finalized.

Thanks everyone for taking time out to discuss ARARs today. Turned out rather well for Friday the 13<sup>th</sup>, right?! ☺

Have a good weekend,

Lynn

*Lynn M. Keller, EI, PMP*

US EPA Region 9 RPM

75 Hawthorne St, SFD 7-1

San Francisco, CA 94105

415-947-4162